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Services Group, Inc., and Sentinel Insurance  
Company, Ltd.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LV DIAGNOSTICS, LLC, a Nevada limited  
liability company,

Plaintiff,

v.

THE HARTFORD FINANCIAL SERVICES  
GROUP, INC., a Connecticut corporation;  
SENTINEL INSURANCE COMPANY, LTD., a  
Connecticut corporation; DOES I through X,  
inclusive; and ROE CORPORATIONS I through  
X, inclusive,

Defendants.

Case No.: 2:17-cv-01371-JCM-PAL

**STIPULATION AND ORDER TO EXTEND  
DISCOVERY DEADLINES**

**(FIRST REQUEST)**

Defendants Hartford Financial Services Group, Inc. (**Hartford**), and Sentinel Insurance Company, Ltd. (**Sentinel**) (collectively **Defendants**), and plaintiff LV Diagnostics, LLC (**Plaintiff**), respectfully submit the following stipulation requesting a forty-five (45) day extension of the current scheduling order deadlines.

**I. INTRODUCTION.**

This case is a dispute arising out of an insurance policy covering the building and business personal property at Plaintiff's location at 600 S. Martin Luther King Boulevard, in Las Vegas, NV. Plaintiff allegedly suffered loss as a result of a break-in on April 8, 2015, and made a claim on its insurance policy. Plaintiff filed a complaint in State Court on April 7, 2017, alleging breach of

contract, breach of the covenant of good faith and fair dealing, bad faith, and unfair trade practices. On May 15, 2017, Defendants removed this matter to Federal Court. A discovery plan and scheduling order was entered on July 14, 2017 [ECF Docket #17].

## II. DISCOVERY STATUS.

On July 14, 2017, the court entered a discovery plan and scheduling order which set the following deadlines:

- (a). Discovery Cut Off: Monday, February 12, 2018.
- (b). Motions to amend pleadings or add parties: Tuesday, November 14, 2017.
- (c). Initial Expert Disclosures: Thursday, December 14, 2017.
- (d). Rebuttal Expert Disclosures: Tuesday, January 16, 2018.
- (e). Interim Status Report: Thursday, December 14, 2017.
- (f). Dispositive Motions: Wednesday, March 14, 2018.
- (g). Pretrial Order: Friday, April 13, 2018.
- (h). Extensions or Modifications of the Discovery Plan and Scheduling Order: Monday, January 22, 2018

### A. Discovery that has been completed.

1. Defendants served their initial disclosures on October 10, 2017.
2. Plaintiff served its initial disclosures on October 2, 2017. The certificate of service indicates that they were mailed earlier, but they were not received. After correspondence, they were submitted.
3. Defendants served their first set of requests for production of documents and first set of interrogatories to Plaintiff on October 10, 2017.

### B. Discovery that Remains.

1. Expert disclosures;
2. Deposition of Expert Witnesses;
3. Written Discovery;
4. Plaintiff's deposition (and follow up discovery on any new issues that arise at the deposition)

1 The parties reserve the right to take additional discovery during the time frames outlined  
2 below should the need arise.

3 C. Pending Motions.

4 There are two motions to dismiss [ECF Docket # 5 & 6] currently pending before the court.

5 **III. REASON WHY EXTENSION IS REQUIRED.**

6 There was a delay in Plaintiff getting initial disclosures served on Hartford. Hartford require  
7 follow up written discovery after these disclosures were received prior to hiring experts.

8 The parties believe an additional forty five (45) days of discovery should be sufficient for  
9 this to take place. This request is being made in a timely manner. The parties believe that good  
10 cause is demonstrated by the above facts and circumstances.

11 **IV. PROPOSED SCHEDULE.**

- 12 (a). Discovery Cut Off: **Thursday, March 29, 2018.**
- 13 (b). Motions to amend pleadings or add parties: **Friday, December 29, 2017.**
- 14 (c). Initial Expert Disclosures: **Monday, January 29, 2018 (deadline falls on a**  
15 **Sunday).**
- 16 (d). Rebuttal Expert Disclosures: **Friday, March 2, 2018.**
- 17 (e). Interim Status Report: **Monday, January 29, 2018 (deadline falls on a**  
18 **Sunday).**
- 19 (f). Dispositive Motions: **Monday, April 30, 2018 (deadline falls on a**  
20 **Saturday).**
- 21 (g). Pretrial Order: **Tuesday, May 29, 2018 (deadline falls on May 28, 2018,**  
22 **Memorial Day).**
- 23 (h). Extensions or Modifications of the Discovery Plan and Scheduling Order:  
24 **Thursday, March 8, 2018.**

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The parties believe that the forty-five (45) day extension of the deadlines in discovery are necessary and appropriate to provide sufficient time to properly determine whether and what experts are required after follow up written discovery is completed.

DATED this 31st day of October, 2017.

AKERMAN LLP	ROGER P. CROTEAU & ASSOCIATES, LTD.
<p><u>/s/ William S. Habdas</u>  <b>DARREN BRENNER, ESQ.</b>  Nevada Bar No. 8276  <b>WILLIAM S. HABDAS, ESQ.</b>  Nevada Bar No. 13138  1160 Town Center Drive, Suite 330  Las Vegas, Nevada 89144</p> <p><i>Attorneys for Hartford Financial Services Group, Inc., and Sentinel Insurance Company, Ltd.</i></p>	<p><u>/s/ Robert W. Linder</u>  <b>ROGER P. CROTEAU, ESQ.</b>  Nevada Bar No. 4958  <b>ROBERT W. LINDER, ESQ.</b>  Nevada Bar No. 3661  9120 W. Post Road, Suite 100  Las Vegas, NV 89148</p> <p><i>Attorneys for LV Diagnostics, LLC</i></p>

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

DATED: \_ November 14, 2017 \_